

### **REMARKS**

Claim 1 is currently pending in the application; with claim 1 being independent. Claim 1 was pending prior to the Office Action.

The Examiner is respectfully requested to reconsider the rejections in view of the amendments and remarks set forth herein. Applicant respectfully requests favorable consideration thereof in light of the amendments and comments contained herein, and earnestly seeks timely allowance of the pending claims.

#### ***Claim Rejections – 35 USC § 103***

The Examiner rejected claim 1 under 35 U.S.C. § 103(a) as being unpatentable over US 6,040,612 (“Minami et al.”) in view of US 7,138,695 (“Kim et al.”).

Applicant traverses this rejection.

Applicant has amended independent claim 1 to recite that “the concave portion forms a clearance between a first adhesion area and a second adhesion area, the first adhesion area being between the solid state image sensor and the cover glass, and the second adhesion area being between the cover glass and the circuit board, wherein the first adhesion area and the second adhesion area are on a same side of the cover glass, and wherein said cover glass is formed in a size for blocking an entrance of said accommodation concave portion.”

The amendment to claim 1 is supported by at least Fig. 2 and paragraph [0022] in the specification.

To establish a *prima facie* case of obviousness, the Examiner has the burden of meeting the basic criterion that the prior art must teach or suggest all of the claim limitations.

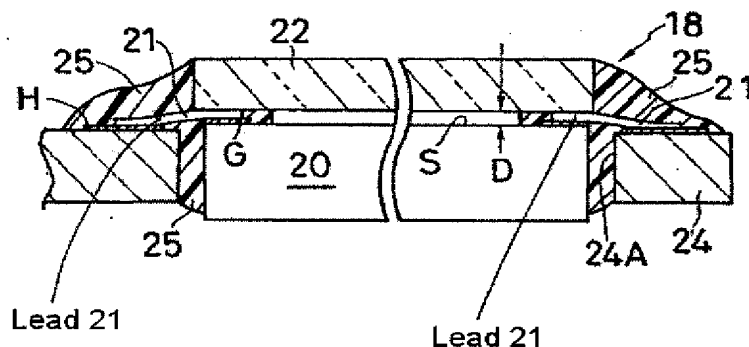
Regarding this basic criterion, the Applicant submits that Minami et al. and Kim et al. do not disclose or suggest, at least, an accommodation concave portion that forms a clearance between a first adhesion area and a second adhesion area, the first adhesion area being between the solid state image sensor and the cover glass, and the second adhesion area being between the cover glass and the circuit board, wherein the first adhesion area and the second adhesion area are on a same side of the cover glass, and wherein said cover glass is formed in a size for blocking an entrance of said accommodation concave portion.

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Minami et al. merely discloses an image pickup apparatus including a conductor lead formed on a terminal of a CCD so as to protrude from the outer periphery of the main frame of an image pickup device body in accordance with a TAB (Tape Automated Bonding) method capable of realizing mass production. A cover glass is set so that an air gap is formed between the CCD and its image pickup plane side, and thereby an image pickup device body is formed. Moreover, the image pickup device body is set to an aperture of a circuit board to connect the conductor lead to a terminal at the circuit board side (Abstract).

The Examiner pointed to an adhesion area at pad G on the left side and at pad H on the right side in Minami and alleged (bottom of page 2 of Office Action) again that "there still is a clearance between a first adhesion area (the adhesion area between the sensor (20) and the cover glass (22) at pad G on the left side) and a second adhesion area (the adhesion area between the pad H, on the circuit board (24), and the cover glass (22) on the right side).

Applicant points out that the Examiner made a mistake in judging the structure of Minami et al. In Fig. 1D of Minami et al. there does not exist such a clearance. As illustrated in the figure below (Fig. 1D from Minami et al., reproduced for Examiner's convenience) a conductor lead 21 is located between one adhesion area (the adhesion area between the sensor 20 and the cover glass 22 at pad G) and another adhesion area (the adhesion area between the pad H, on the circuit board 24, and the cover glass 22) (col. 4 lines 10-22). Conductor leads 21 are located on both sides of the cover glass 22. Furthermore, an adhesive 25 is filled in the other areas in which lead 21 is not provided (col. 4 lines 45-50). Therefore, the clearance alleged by the Examiner does not exist.



As illustrated in Fig. 1D of Minami et al., no clearance exists between adhesion areas at points G and H located on a same side of the cover glass 22.

Claim 1 also recites that “said cover glass is formed in a size for blocking an entrance of said accommodation concave portion.” In Minami et al., no entrance of a concave portion exists. As illustrated in Fig. 1D of Minami et al., cover glass 22 is not blocking any entrance of a concave portion.

Kim et al. merely discloses a method for packaging a pickup device including the steps of forming a printed circuit of a predetermined pattern on an upper surface of a transparent medium, forming a first bump and a second bump on the upper surface of the transparent medium, first bonding the first bump with a pattern of an image chip so as to be electrically connected to each other, secondly bonding the second bump with a circuit of a flexible PCB so as to be electrically connected to each other, and molding a rear surface of the flexible PCB, on which an image chip is mounted, by means of epoxy resin (Abstract).

Kim et al. does not show a clearance between a first adhesion area and a second adhesion area, the first adhesion area being between the solid state image sensor and the cover glass, and the second adhesion area being between the cover glass and the circuit board, wherein the first adhesion area and the second adhesion area are on a same side of the cover glass and wherein the cover glass is formed in a size for blocking an entrance of an accommodation concave portion. In Fig. 4, for example, there is no clearance between bumps 14 and 13 (Applicant does not admit that these are adhesion areas) located on a same side of the transparent medium 18.

Hence, Minami et al. and Kim et al. fail to teach or suggest all of the elements for claim 1.

For all of the above reasons, taken alone or in combination, Applicant respectfully requests reconsideration and withdrawal of the 35 U.S.C. § 103(a) rejection.

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**Conclusion**

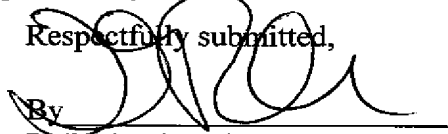
In view of the above amendments and remarks, this application appears to be in condition for allowance and the Examiner is, therefore, requested to reexamine the application and pass the claims to issue.

Should there be any outstanding matters that need to be resolved in the present application, the Examiner is respectfully requested to contact Corina E. Tanasa, Limited Recognition No. L0292 under 37 CFR §11.9(b), at telephone number (703) 208-4003, located in the Washington, DC area, to conduct an interview in an effort to expedite prosecution in connection with the present application.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment to Deposit Account No. 02-2448 for any additional fees required under 37 C.F.R. §§ 1.16 or 1.17; particularly, extension of time fees.

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Respectfully submitted,



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